



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 21 1999

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4WD-RPB

Mr. Lloyd W. Taylor
General Manager
Textron Automotive Company
635 Highway 332
Grenada, Mississippi 38901

Subject: May 13, 1999 Meeting Follow-up
Textron Automotive Inc., Grenada, MS
EPA ID No. MSD 007 037 278

Dear Mr. Taylor:

The U.S. Environmental Protection Agency (EPA) project manager, Ms. Lael H. Butler, participated in a May 13, 1999, meeting with Mr. Don Williams - Textron, Mr. John Bozick - Meritor, and the consultants from Eckenfelder. The meeting was conducted in the Region 4 office. The purpose of the meeting was to conduct a brief but comprehensive review of the information contained in the 1994 Remedial Investigation (RI) Report. The RI Report was generated in response to a Mississippi Department of Environmental Quality (MDEQ) administrative order on consent designed to investigate the regulated unit, the Equalization Lagoon, and was expanded to include other waste management areas such as the Sludge Lagoon and the On-site Landfill. Both the Sludge Lagoon and the On-site Landfill are also solid waste management units (SWMUs).

On March 2, 1999, the EPA issued a combined RCRA Facility Investigation (RFI)/Confirmatory Sampling (CS) Work Plan call letter. The RFI/CS Work Plan was required to provide information and investigation at SWMUs in accordance with Conditions II. D and E of the federal portion of the full RCRA Permit. The federal portion, which is called the Hazardous and Solid Waste Amendments (of 1986), or HSWA Permit, was issued July 7, 1998, and included environmental investigation requirements for 5 SWMUs and 3 areas of concern (AOCs) (see enclosure for Appendices A-1 and A-3).

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In response to the call letter, Meritor submitted the 1994 Remedial Investigation (RI) Report. Prior to that time, the EPA administrative record only contained 1 of the 12 documents and none of the oversized drawings that were included in the March 30, 1999, submittal. EPA completed a technical review of the 1994 RI Report to determine whether it meets the HSWA requirements for the above mentioned environmental investigation requirements for the SWMUs and AOCs identified in the HSWA Permit. EPA hereby accepts the 1994 RI Report in lieu of the submittal of a combined RFI/CS Work Plan. However, if new information or previously undiscovered information indicates that additional sampling is necessary, EPA will require Textron to do so.

Enclosed are Appendices A-1 and A-3 from the HSWA Permit and the summary points from the meeting. EPA is encouraged that at this time it does not seem necessary to require further investigation to determine the extent of contamination from any of the SWMUs or AOCs which are listed as requiring either a RFI or CS. The 1994 RI Report contains excellent narrative information in addition to site-wide soil and groundwater plume delineation oversized maps.

However, it was discussed and agreed that Textron will submit, within 60 days of receipt of this letter, a "Summary Report" which will include, but is not limited to, a narrative description of all monitoring and corrective action performed site-wide from 1994 to present. Be specific on what the data indicates about potential contamination from SWMUs or AOCs, if any. Graphs and figures may also be included. References to the oversized drawings are acceptable and subsequent resubmittal of the oversized drawings is not required. If there are overlay maps for the oversized drawings that need to be submitted for clarification, please submit them.

The project managers, EPA-MDEQ-Textron-Meritor, are in good verbal and electronic contact with each other and are discussing the current status of Textron with respect to the RCRA corrective action process and what will be the next step(s) will be for enhancing the existing corrective action (which was initiated through the Mississippi Department of Environmental Quality's base RCRA Permit). Thank you for the good cooperation and working relationship that exists between EPA and Textron. Should you have any questions or concerns, please contact Ms. Butler, South Programs Section, at (404) 562-8453.

Sincerely,



Narindar M. Kumar, Chief
RCRA Programs Branch
Waste Management Division

Enclosures

cc: Louis Crawford, MDEQ w/enclosures
Don Williams - Textron Automotive Co. w/enclosures
John Devic - Textron Automotive Co. w/enclosures
John Bozick - Meritor Automotive w/enclosures

ENCLOSURE 1

A.1. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a RCRA Facility Investigation (RFI):				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media ¹
SWMU 2*	Equalization Lagoon	Surface Impoundment	1961-1994	A, SS, SW, GW, S
SWMU 3*	On-Site Landfill	Landfill	1961-1967	A, SS, SW, GW, S
SWMU 4*	Sludge Lagoon	Surface Impoundment	1977-Present	A, SS, SW, GW, S
SWMU 7	Outfall Ditch	Ditch	1961-Present	A, SS, SW, GW, S
SWMU 12	Wet Well	Inground Tank	1977-Present	A, SS, SW, GW, S
SWMU 14	Destruct Pit	Chromium Reduction Unit/ Holding Sump	1961-Present	A, SS, SW, GW, S
AOC A	Former TCE Storage Area	Contamination Area	~1973-Present	A, SS, SW, GW, S
AOC B	Former Toluene UST Area	Contamination Area	Late 1960s- Present	A, SS, SW, GW, S

*Unit regulated by State Permit.

A.3. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring Confirmatory Sampling:				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media
SWMU 13	Wastewater Treatment Plant	Treatment Plant	1977-Present	A, SS, SW, GW, S
SWMU 15	Process Sewers	Sewer System	1961-Present	A, SS, SW, GW, S
AOC C	Fuel Tank Farm Containment Area	Secondary Containment	1960s-Present	A, SS, SW, GW, S

¹Potentially Affected Media:

A - Air
 SS- Subsurface Gas
 SW - Surface Water
 GW - Ground Water
 S - Soil

ENCLOSURE 2

Summary Points May 13, 1999 Meeting

1. A review of the SWMUs and AOCs which require a RCRA Facility Investigation according to Appendix A-1 of the HSWA Permit was conducted. Specifically, SWMUs 2, 3 and 4 require no further action at this time. SWMU 2 was the regulated unit and is in post-closure at present. SWMUs 3 & 4 were investigated and remediated during 1992-1994 and also require no further action at present.
2. After review of the 1994 RI Report, it has been determined that SWMUs 7 & 12 do not require any further action, at this time. The "summary report", which is to be prepared and submitted within 60 days of receipt of this letter, should include the reasons (as discussed in the meeting) why no further investigatory action is necessary for these two SWMUs.
3. The summary report will document and discuss the media specific concentrations and extent of contamination as determined from the monitoring data. Be specific with respect to all data collected and evaluated from SWMUs #13, 14, 15 and AOCs A, B and C.
4. Once the Summary Report is prepared, submitted and reviewed, the next step will be to determine whether a Corrective Measures Study Work Plan is required. The existing corrective action system will be incorporated into any corrective action that may be required at the HSWA regulated SWMUs and AOCs.

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The project managers, EPA-MDEQ-Exxon-Meritor, are in good verbal and electronic contact with each other and are discussing the current status of Exxon with respect to the RCRA corrective action process and what will be the next step(s) will be for enhancing the existing corrective action (which was initiated through the Mississippi Department of Environmental Quality's base RCRA Permit). Thank you for the good cooperation and working relationship that exists between EPA and Exxon. Should you have any questions or concerns, please contact Ms. Butler, South Programs Section, at (404) 562-8453.

Sincerely,


Narindar M. Kumar, Chief
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G:TXTMTG-NEXTSTEP

BUTLER WILLIAMS KUMAR



W/ST
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